

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: THE ALLSTATE CORPORATION  
SECURITIES LITIGATION

Case No. 16-cv-10510  
Hon. Beth W. Jantz

**MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Rules 5.8 and 26.2, defendants The Allstate Corporation (“Allstate”), Thomas J. Wilson, and Matthew E. Winter, request leave to file under seal certain limited portions of their memorandum of points and authorities in support of their motion to exclude the testimony of Steven E. Hall and Steven C. Root, as well as the exhibits to the accompanying declaration of Kenneth L. Schmetterer dated March 4, 2021. In support, defendants state:

1. In accordance with the minute order entered February 18, 2021, ECF No. 367, defendants are submitting a motion to exclude plaintiffs’ proposed experts Steven E. Hall and Steven C. Root, as well as a memorandum of points and authorities and declaration in support of the motion. The memorandum and supporting declaration quote and reference documents, deposition transcripts, and expert reports produced or disclosed by the parties in discovery pursuant to the terms of the confidentiality order in this matter. *See* ECF No. 95.

2. To comply with their obligations under the confidentiality order, and in the interest of justice, defendants request that the Court enter an order permitting defendants to file limited portions of their memorandum and supporting declaration under seal and to publicly file redacted versions of these documents from which the confidential material has been removed.

3. Judge Gettleman and Magistrate Judge Weisman previously granted the parties' motions to seal substantially identical discovery materials in connection with prior briefing in this action. *See* ECF Nos. 133, 145, 202, 237, 247, 256, 329, 341, 347.

**WHEREFORE**, defendants respectfully request that the Court grant this motion and enter an order granting defendants leave to file under seal certain limited portions of their memorandum of points and authorities in support of the motion to exclude plaintiffs' proposed experts Steven E. Hall and Steven C. Root, as well as the exhibits to the accompanying declaration of Kenneth L. Schmetterer dated March 4, 2021.

Dated: Chicago, Illinois  
March 4, 2021


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